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Honorable Stephen G. Breyer  
United States District Court  
450 Golden Gate Avenue  
San Francisco, CA 94102

April 18, 2008

Re: U.S. v. Anyanwu & Ashiegbu (CR 07-0677 CRB)

Dear Judge Breyer,

I am writing to apprise the Court of Andrew Ashiegbu's response to the receipt of AUSA Danner's letter. The government's submission has greatly streamlined the issues and obviated the need for several defense motions as was undoubtedly the Court's intention. In light of the government's stated intention, though, it is apparent that Mr. Ashiegbu will require the testimony of Alice Anyanwu.

As detailed in the government's letter to the Court, the issue of whether Doris Anyanwu lived with Andrew Ashiegbu in Oklahoma between 1981 and 1988 is at the heart of the case. Both Doris and Andrew have made statements - written and oral - that she did. The government states that it is prepared to offer the testimony of Andrew Ashiegbu's former wife to establish that Doris did not do so. The only other person with direct knowledge of the truth or falsity of such event is Alice Anyanwu, Doris' mother. Doris and Andrew have indicated that Alice also lived with them during the specified time period. Thus, Alice's testimony confirming that will be of paramount importance to counter the purported testimony of Andrew's former wife.

Alice Anyanwu is a native and citizen of Nigeria. To counsel's understanding, she has no legal ability to enter the United States. To secure her

testimony, counsel will request that the Court authorize a deposition of Alice Anyanwu pursuant to Rule 15 of the Federal Rules of Criminal Procedure.

Other than the above, counsel does not anticipate any other pretrial motions.

Sincerely,

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JAMES P. VAUGHNS  
Attorney for ANDREW ASHIEGBU